

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

**CARLIE SHERMAN, ANNA GOZUN, and
AMANDA NASH, on behalf of themselves and
all similarly situated persons,**

PLAINTIFFS,

v.

**TRINITY TEEN SOLUTIONS, INC., a
Wyoming corporation; ANGELA C.
WOODWARD; JERRY D. WOODWARD;
KARA WOODWARD; KYLE WOODWARD;
and DALLY-UP, LLC, a Wyoming limited
liability corporation,**

DEFENDANTS.

Case No. 20-CV-00215-SWS

**CLASS ACTION COMPLAINT FOR
VIOLATIONS OF THE TRAFFICKING
VICTIMS PROTECTION
REAUTHORIZATION ACT, 18 U.S.C. §
1595, FEDERAL RACKETEER
INFLUENCED AND CORRUPT
ORGANIZATIONS ACT, 18 U.S.C. § 1964,
AND WYOMING COMMON LAW**

**JURY TRIAL DEMANDED
PURSUANT TO FED. R. CIV. PRO. 38(a)
& (b)**

PLAINTIFFS' FIRST SUPPLEMENTAL RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Plaintiffs makes the following additional disclosures to Defendants:

- (i) **The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;**

Name	Address & Phone	Subject of Discoverable Information
Sara Boyd, Ph.D. Licensed Clinical Psychologist	May be contacted through Plaintiff	Dr. Boyd is Plaintiffs' expert witness. She is a Licensed Clinical Psychologist/Forensic Evaluator. She has conducted and will continue to conduct evaluations of the named Plaintiffs and putative class members. Detailed reports of her findings will be provided at the appropriate expert witness disclosure deadlines.
Michelle Jerde	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Claire Malone Matson	Address unknown, 305-877-0340	Individual will have general and specific information as to the facts of the case.
Jessica Hollett	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Rebecca Seghers	Address unknown, 805-328-1263	Individual will have general and specific information as to the facts of the case.
Ali Barton	Address unknown, 702-569-7162	Individual will have general and specific information as to the facts of the case.
Ana- Leigh Avery	Address unknown, 406-381-6741	Individual will have general and specific information as to the facts of the case.
Carly Niklas	Address unknown, 517-894-3140	Individual will have general and specific information as to the facts of the case.
Megan Whitehouse	Address unknown, 432-236-1742	Individual will have general and specific information as to the facts of the case.
Gabrielle Carbee	Address unknown, 603-717-2014	Individual will have general and specific information as to the facts of the case.
Shelby Bolders	Address unknown, 720-371-4629	Individual will have general and specific information as to the facts of the case.
Abby Meehan	Address unknown, 414-499-7990	Individual will have general and specific information as to the facts of the case.
Dennett Beaulieu	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Kayla Fritzler	Address unknown, 308-629-8189	Individual will have general and specific information as to the facts of the case.
Mary Manning	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Emily (Ellie) Cassidy	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
April Durant	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Chanel Plander	Address unknown, 895-639-9140	Individual will have general and specific information as to the facts of the case.
Bridget McGhee Hazelrig	Address unknown, 205-616-6586	Individual will have general and specific information as to the facts of the case.

Carolyn Woods	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Christina Navarez	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Class Members	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Kaija Herren	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Kristin Rafferty	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Laura McGetrick	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Ariana DiTrollo	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Sophia Boutrous	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Emily Barr	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Kelsey Wade	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Kelsie VanMeveren	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Kaitlyn Dahone	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Melanie Malisha	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Hannah Lutz	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Sami Rydzik	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Mollie Jelinek	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Aubrie Bak-Jenson	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Samantha Salcido	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Hailey Seigel	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Stephanie Bolton	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Kaylynn Rohde (Mary)	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Mallory Thrailkill	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.

Brie Healy	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Alex Graig-Tiso	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Victoria Coyne	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Bianca Rodriguez	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Jessie Newton	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Maggie Higgins	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Elizabeth Mahdavi	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Clarice Steg	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Genevieve Wilson	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Tamina Yousef	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Carrie Brocket	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Tarah Blakeslee	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Shelbea Lane	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Courtney Livermore	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Cassie Dzeda	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Sydney Vespa	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Lizzie Hollmann	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Celine Bogner	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Shanice Conklin	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Kaylee Barth	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Alyssa Jalomo	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Aerial Roby	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.

Keila Koellner	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Angelica Maria	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Simone Horsley	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Elena Bock	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Kaylee Baumbusch (Kaylee Barth)	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Adelina Hargins	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Kyrie O'Donnel	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Stephanie Rivera	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Thalia De Kay	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Jacie Lester	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Charity Seitz	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Lauryn Fugate	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Alexis Bartholomew	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Brittany McLean	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Olivia Finklestein	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Addison Saxton	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Julie Arhelger	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Eve Martinez	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Grace Elizabeth Lovering	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Gabrielle McGarraugh	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Minor P.W.	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Alexandria Spiller	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.

Genevieve Anria	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Bella Jensen	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Claire Suddreth	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Avy Chavarria	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Adrianna Talento	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Chloe Haas	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Christine Moss	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Erin Lee	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Emily Brown	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Taybre Conrad	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Annie Denvir	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Brooke Arnold	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Sofi Humphrey	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Jessica Analee Sadberry	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Lauren "Nora" Budke	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Hayden Smith	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Jasmine Augustine	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Naomi Ruth Ann	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Maycie "May" Moss	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Aliya Fabello	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Minor H.C.	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Kaitlyn Tolliver	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.

Minor B.K.	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Minor S.P.	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Libby Bradley	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Alana George	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Violette Grant	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Brittney Swan	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Tattianna Ulrich	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Breezy Stirling	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Harley Olson	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Jessica Lancaster	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Shaley Hadrava	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Carrie Provencher	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Sydney Cimino	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Shyanne Williamson	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Virginia Herzog	May be contacted through Plaintiff	Class member will have general and specific information as to the facts of the case.
Staff or former staff of TTS		
Sarah Ward	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Janine Hair	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Hope Blinne	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Aleshia Renkemeyer	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Liz Meehan	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Kristen Tichener Dorth	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.

Amanda Byers	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Samantha Hill (Heubsch)	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Caty Tanaka	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Talina Hinerman	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Marie Shelli Gasparro	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Katie Iverson	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Becca Floyd	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Tracie Moren	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Angela Jay	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Carly Skripak	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Janet Carrol	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Erin Elston	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Dani Shuemer	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Bryan Willoughby	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Nathalie Marie	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Nicole Boner	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Katrina Fuhrman	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Michelle (Shel) Wilson	Address and phone no. unknown	Individual will have general and specific information as to the facts of the case.
Jenna Neven (formerly Miller)	Address unknown, 802-345-0585	Individual will have general and specific information as to the facts of the case.
Emily Blair	Address Unknown, 307-272-9018	Individual will have general and specific information as to the facts of the case.

Again, Plaintiffs and class members identify any other class members not hereto identified. Plaintiffs and class members further identify any nurses and/or healthcare providers,

both known and unknown, that provided treatment to Plaintiffs or class members while they were located at the ranch in Wyoming and subsequent to their release from the ranch

Additionally, Plaintiffs and class members identify any employees of the ranch not hereto identified that supervised Plaintiffs or class members during the relevant time periods.

Furthermore, Plaintiffs and class members identify any individual previously identified in initial disclosures from either Plaintiffs or Defendants.

- (ii) **A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may use to support its claims or defenses, unless the use would be solely for impeachment;**

Plaintiffs identify the following documents, electronically stored information, and tangible things in their possession, custody or control and may use them to support their claims:

1. Dr. Sara Boyd's 2020 CV.
2. Dr. Sara Boyd's 2020 Fee Schedule

Plaintiffs aver that Dr. Boyd's 2022 CV and Fee Schedule shall be provided to Defendants along with her expert disclosures.

[Signature on following page]

Respectfully submitted,

/s/ Craig A. Edgington

Craig A. Edgington (#38205)

Brice M. Timmons (#29582)

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Frank L. Watson, III (TN Bar #015073)

Pro Hac Vice Pending

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Memphis, TN 38104

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Fax: (901) 529-7998

fwatson@watsonburns.com

*ATTORNEYS FOR PLAINTIFFS AND
PUTATIVE CLASS MEMBERS*

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2022, I electronically transmitted the foregoing supplemental disclosures and identified documents to each of the following counsel of record in this case:

Thomas Quinn, WSB #5-2630
Lillian Alves, CO Bar #37083
Lindsay Romano, CA BAR #0069838
555 Seventeenth Street, Suite 3400
Denver, CO 80202
(303) 534-5160

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lalves@grsm.com

lromano@grsm.com

*ATTORNEYS FOR DEFENDANTS TRINITY
TEEN SOLUTIONS, LLC, ANGELA
WOODWARD, JERRRY WOODWARD,
KARAWOOWARD, KYLE WOODWARD,
AND DALLY UP, LLC*

/s/ Craig A. Edgington